

Overview of Respondent's 4,436-page Motion to Compel Discovery

1. The following document exemplifies Respondent's subversive attempt to withhold discovery and provide incomplete, incorrect, and evasive information.
2. Respondent's documents included ~ 2,877 pages which repeated their discovery numerous times; ~ 740 pages of pages of blank spreadsheets; ~ 1,000 pages of evidence provided by Defendant to Respondent which were not requested, were not applicable and/or relevant.
3. Approximately 95.5 % of Respondent's submitted discovery does not provide answers to discovery requests by Defendant.

Page No.	Subject	Failure to answer: Did not ask for this; not applicable or relevant	Failure to answer: Defendant' provided as evidence to Respondent.	Failure to answer: Information duplicated several times	Evasive or incomplete answer.
1 - 2	Travel Authorization 2014	X		X	X
3 - 7	3 rd posting CEO documents	X	X	X	X
8 - 114	Controlled Substance loss spreadsheets from 2015-16	X		X	X
115 - 521	3 rd posting CEO documents	X Requested 1 st and 2 nd posting documents, did not receive.	X	X	X
522 - 533	DPS EEO investigator documents	Requested recordings, did not receive		X	X
534 - 535	DPS exempt positions	X		X	X
536	Defendant's FMLA provider medical note	X		X	X
537 - 728	DPS EEO mediation, hearing, and final agency decision (FAD)		X	X	X

Page No.	Subject	Failure to answer: Did not ask for this; not applicable or relevant	Failure to answer: Defendant' provided as evidence to Respondent.	Failure to answer: Information duplicated several times	Evasive or incomplete answer.
1020-1058	Repeated DPS EEO information	X		X	X
1059-1062	Defendant's EEOC charge dated Aug. 10, 2022	X	X	X	X
1063	DPS EEO investigation and hearing documents	X		X	X
1076-1078	Email about FMLA	X		X	X
1079	2008 Career Banding	X		X	X
1080-1104	Change in Pharmacy Manager emails	X		X	X
1105 - 1109	Random email related to false OSI investigation	X		X	X
1110-1213	Repeated emails 2016-2019, USP 800, Omnicell, DEA, Controlled Substance, OSI	X		X	X
1214-1338	Repeated OSI complaint: Oct 17. 2019 and DPS mediation and hearing	X Requested recording of investigation. Did not receive.		X	X
1339-1350	DPS positions spreadsheet	X			X
1351-1353	Repeated DPS EEO FAD	X	X	X	X

Page No.	Subject	Failure to answer: Did not ask for this; not applicable or relevant	Failure to answer: Defendant' provided as evidence to Respondent.	Failure to answer: Information duplicated several times	Evasive or incomplete answer.
1370- 372	Hazardous Drug in Healthcare setting	X		X	X
1073-1430	Repeated 3 rd CEO posting documents	X	X	X	X
1431 - 1436	Implementation of 10-hour workweek memo from 2005	X	X	X	X
1437-1444	Repeated EEO mediation, hearing info	X		X	X
1445-1575	OSI information	Requested recording of OSI investigation: did not receive		X	X
1576- 1604	Repeated 3 rd CEO posting; exempt emails; DEA, FMLA; personnel history from 2010.	X		X	X
1605-1607	Ethyl Chloride safety data sheet	X		X	X
1609- 613	Training records	X		X	X
1614-1622	Repeated travel authorization 2014; 3 rd CEO posting info.	X		X	X
1623-180	185 Blank Spreadsheets	X		X	X

Page No.	Subject	Failure to answer: Did not ask for this; not applicable or relevant	Failure to answer: Defendant' provided as evidence to Respondent.	Failure to answer: Information duplicated several times	Evasive or incomplete answer.
1900-1925	Documents from OAH case 19-OSP-01028	X	X		X
1926-1939	Repeated controlled substance documentation from 2016	X		X	X
1940-2346	Repeated 3 rd CEO posting documents	X		X	X
2347-2763	Repeated DPS hearing and mediation, OSI	X		X	X
2764-2843	Repeated 3 rd CEO posting documents	X		X	X
2844- 2897	Repeated DPS EEO findings	X		X	X
2898-2902	Repeated FMLA	X		X	X
2903	Career Banding from 2008, no longer used	X			X
2904-2981	Repeated emails from 2016, 2017, 2019	X		X	X
2982-3004	Repeated controlled substance information	X		X	X
3005-3157	Repeated OSI, hearing, EEO	X		X	X
3158-3169	Repeated list of DPS positions	X		X	X

Page No.	Subject	Failure to answer: Did not ask for this; not applicable or relevant	Failure to answer: Defendant' provided as evidence to Respondent.	Failure to answer: Information duplicated several times	Evasive or incomplete answer.
3193-3377	184 Blank Spreadsheets	X		X	X
3378- 3435	Repeated 3 rd posting documents	X	X	X	X
3436-3441	Repeated 10-hour work week from 2005	X		X	X
3442-3580	Repeated informal discussion, OSI, grievance info.	X		X	X
3581-3693	Repeated OSI documents	X		X	X
3694-3699	Repeated training records	X		X	X
3700-3745	Repeated OSI, USP 800, Requests for transfer, medical note,	X		X	X
3746-3762	Repeated 3 rd CEO posting documents, FMLA, FAD, Mediation	X	X	X	X
3763-3915	Dependent's work history; misc. documents; 2003 – 2011.	X		X	X
3916-3923	Repeated controlled substance documentation	X		X	X

Page No.	Subject	Failure to answer: Did not ask for this; not applicable or relevant	Failure to answer: Defendant' provided as evidence to Respondent.	Failure to answer: Information duplicated several times	Evasive or incomplete answer.
3937-3946	Repeat of Defendant's training history, EEOC filing	X		X	X
3947-4019	Defendant's exhibits given to DPS for hearing. Not requested	X	X		X
4020-4391	371 Blank spreadsheets	X		X	X
4392-4429	Repeated EEO documents	X		X	X
4430-4436	Employee history for one random retired DPS employee	X			X